

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of
*(Briefly describe the property to be searched
 or identify the person by name and address)*
 United States Priority Mail Express Parcel
 EI 215 435 477 US, currently located at the USPS office
 in Columbus, Ohio

Case No. 2:22-mj-625

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A, which is fully incorporated herein.

located in the Southern District of Ohio, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, which is fully incorporated herein.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. § 841(a)(1)	Possession with intent to distribute a controlled substance
21 U.S.C. § 843(b)	Prohibited use of a communication center (U.S. Mail)
21 U.S.C. § 846	Conspiracy to distribute an possess with intent to distribute a controlled substance

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector Justin D. Koble, which is fully incorporated herein.

- ☒ Continued on the attached sheet.
☒ Delayed notice of 30 days *(give exact ending date if more than 30 days)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Justin D. Koble, US Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 telephone *(specify reliable electronic means)*.

Date: 9/20/2022

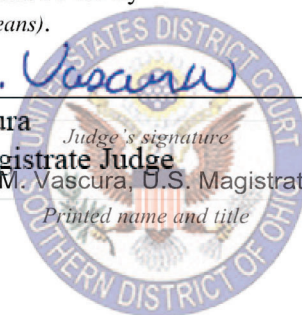
City and state: Columbus, Ohio

Chelsey M. Vascara

United States Magistrate Judge

Chelsey M. Vascara, U.S. Magistrate Judge

Printed name and title



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN THE MATTER OF THE OPENING AND SEARCH OF:)	CASE NO. 2:22-mj-625
)	
UNITED STATES PRIORITY MAIL EXPRESS PARCEL EI 215 435 477 US)	MAGISTRATE JUDGE VASCURA
)	

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Justin D. Koble, being duly sworn, do hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS’s Columbus, Ohio field office. In this capacity, I am responsible for investigating the illegal use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of, among other statutes, Title 21, United States Code, Sections 841(a)(1) (manufacturing, distributing, or possessing with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of Title 18, United States Code, Sections 1956 and 1957 (money laundering).

2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants that have resulted in the discovery of controlled substances and drug proceeds. My current

assignment to the Columbus Processing and Distribution Center (“P&DC”) involves investigating the use of the US Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

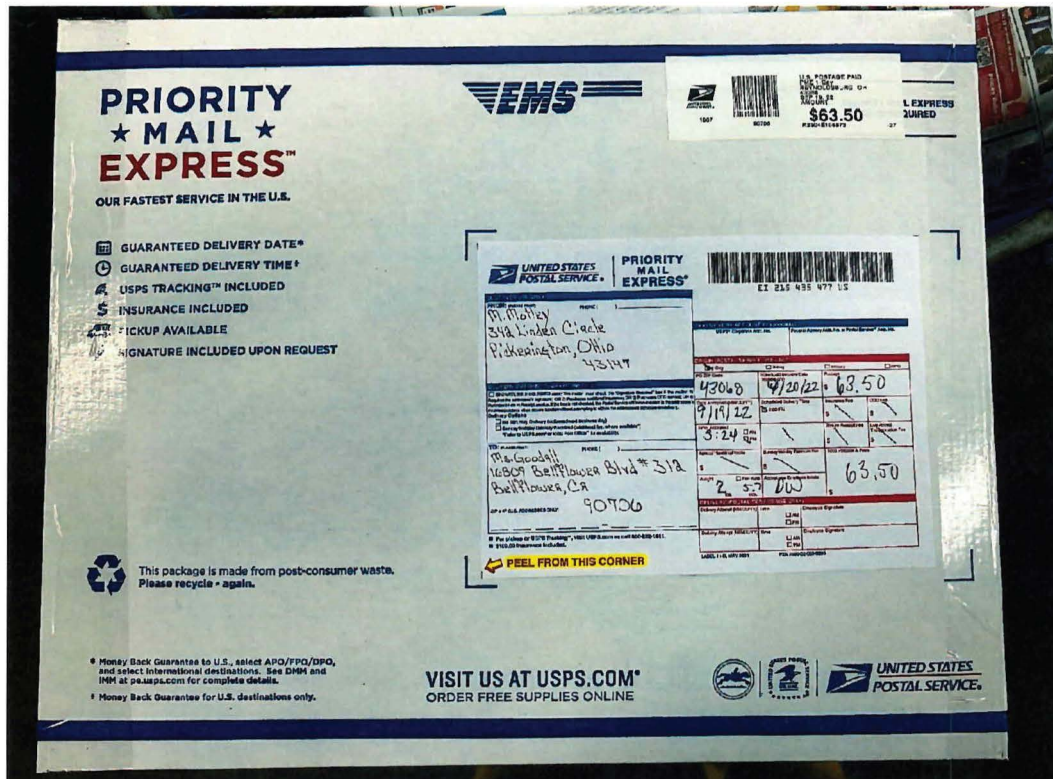
3. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

4. This affidavit is made in support of an application under Rule 41 of the Federal Rules of Criminal Procedure, for a warrant to search for and seize evidence, instrumentalities, contraband, and fruits of violations of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distributing, or possessing with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy), from the United States Priority Mail Express parcel bearing United States Postal Service (“USPS”) tracking number EI 215 435 477 US (hereinafter referred to as the “SUBJECT PARCEL”).

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On or about September 19, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted the SUBJECT PARCEL at the USPS Reynoldsburg Main Post Office, 7185 East Main Street, Reynoldsburg, Ohio 43068. The SUBJECT PARCEL is addressed to "Ms. Goodall, 16809 Bellflower Blvd #312, Bellflower, CA 90706" with a return address of "M. Motley, 342 Linden Circle, Pickerington, Ohio 43147". The SUBJECT PARCEL is a white USPS Priority Mail Express mailing box measuring approximately 15" x 12" x 3 1/8" and weighing approximately 2 pounds, 5.7 ounces. The \$63.50 in US postage affixed to the SUBJECT was paid for using a debit card. The issuing bank and cardholder information was not immediately available due to privacy concerns but will be obtained by investigators in the future.



INDICATORS REGARDING THE PARCEL

7. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL is the “source state” origination of the parcel, as well as the destination of the SUBJECT PARCEL.

8. Your affiant submits that the destination state of the SUBJECT PARCEL bears on the issue of probable cause here. For example, US Postal Inspectors, Special Agents of the Drug Enforcement Administration (“DEA”), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. Based on my training and experience, I know drug traffickers frequently utilize various shipping and mail entities, including the United States Postal Service, for the shipment of controlled substances. Frequently the same shipping entity utilized for the shipment of controlled substances is also utilized for the shipment of the proceeds derived from the sale of these controlled substances.

9. On or about September 20, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on the SUBJECT PARCEL. The destination address, “16809 Bellflower Blvd #312” was found to be a valid and deliverable address in the 90706 zip code. Checks of open-source electronic databases determined the address is the location of the Mail Room. Investigators determined the Mail Room to be a Commercial Mail Receiving Agency (CMRA) in operation at that location. A CMRA is a private business which leases mailboxes, similar to USPS PO Boxes, and accepts delivery of mail and parcels from the USPS and other private carriers on behalf of paying customers. Based on my training and experience, CMRAs are frequently utilized for the receipt of controlled substances as well as the proceeds from the sale

of these controlled substances. Boxes at CMRAs are often obtained using fictitious names and supporting documentation to avoid detection by law enforcement. Investigators were not able to associate the name “Ms. Goodall” with this address.

10. On or about September 20, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, “342 Linden Circle”, was determined to be a valid and deliverable address in the 43147 zip code. The name “M. Motley”, aka Malinda Motley, was found to be associated with this address.

11. Regarding both the above-described return and destination addresses, I know through training and experience, that shippers of drugs and drug proceeds will often utilize the name and address of a friend or relative as a return address to reduce the possibility of identification and apprehension by law enforcement while also allowing for the recovery of the parcel in the event it is returned to sender by the USPS. Based on my training and experience, I know mailers of drug proceeds will often utilize legitimate recipient names and addresses due to the fact the mailing of US currency through the US Mail is not a crime in and of itself.

BACKGROUND OF INVESTIGATION

12. Beginning in May 2022, US Postal Inspectors and Central Ohio HIDTA Task Force Officers began a drug trafficking investigation involving the shipment of methamphetamine from California to Central Ohio. During the investigation, Jermaine Jeffries (JEFFRIES), and others have been found to be associated with this drug trafficking organization (DTO). This DTO is known to ship large quantities of methamphetamine via the USPS and other private carriers from California to Central Ohio and to send the proceeds from the sale of these controlled substances from Central Ohio to California using the same methods.

13. In June 2022, HIDTA Task Force Officers identified two FedEx parcels mailed from California to two addresses in the Columbus, Ohio area using the same return information, “FXK Racing, 1230 E Colorado Blvd, Pasadena, California 91106”. One of the parcels, bearing FedEx tracking number 2742 8608 6585 was addressed to “2870 Arrowsmith Dr, Reynoldsburg, Ohio 43068” which is known by investigators to be the current address of JEFFRIES. This parcel was allowed to be delivered. The second parcel, bearing FedEx tracking number 2742 8634 5929, was addressed to 2239 Garnet Place, Columbus, Ohio 43232, an address known by investigators to receive suspicious USPS parcels believed to be associated with this DTO. The parcel destined for 2239 Garnet Place was searched pursuant to a search warrant issued by the Franklin County Municipal Court, Columbus, Ohio and resulted in the seizure of approximately fifteen pounds of suspected methamphetamine.

14. On or about June 22, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted a USPS Priority Mail Express parcel, mailed by JEFFRIES, and addressed to “Out Cold Ent, 8549 Wilshire Blvd Suite #182, Beverly Hills, CA 90211” with a return address of “Malinda Motley, 342 Linden Circle, Pickerington, Ohio 43147”, the same return address as the SUBJECT PARCEL. This parcel was searched pursuant to a federal search warrant issued in the Southern District of Ohio and resulted in the identification of \$7,800 in U.S. currency, believed by investigators to be the proceeds from the sale of controlled substances.



15. On September 19, 2022, a GPS tracking device, affixed to the 2017 Nissan Armada, known to be utilized by JEFFRIES, was observed traveling to the USPS Reynoldsburg Main Post Office, 7185 East Main Street, Reynoldsburg, Ohio 43068, arriving at approximately 3:13 p.m. EDT. The GPS tracking device indicated the Nissan Armada departed the Reynoldsburg Main Post Office at approximately 3:29 p.m. EDT. USPS business records indicate the SUBJECT PARCEL was mailed at approximately 3:24 p.m. EDT.

16. US Postal Inspectors arrived at the Reynoldsburg Main Post Office at approximately 3:50 p.m. EDT and were able to locate and take custody of the SUBJECT PARCEL. The name indicated on the SUBJECT PARCEL, "M. Motley", aka Malinda Motley, is believed by investigators to be the sister of JEFFRIES.

EXAMINATION BY DRUG DETECTING CANINE

17. On or about September 20, 2022, US Postal Inspectors contacted Trooper Jeff McNamara, Ohio State Highway Patrol, who is the handler for "Dale", a Drug Detecting Canine. K-9 "Dale" has been certified by the Ohio Peace Officers Training Association since June 2022 for tracking, article search, and the detection of cocaine, heroin, methamphetamine, and their derivatives. K-9 "Dale" has had over 200 hours of training at the Ohio Highway Patrol K9

Training Facility. Both in training and actual deployments, K-9 “Dale” has successfully detected narcotics, by demonstrating clear, passive alerts, and has established himself as a highly reliable police service dog.

18. Although not trained specifically in the detection of currency, currency which is generated through the sale of controlled substances frequently contains residual odors of these controlled substances which are detectable to a drug detecting canine.

19. The SUBJECT PARCEL was hidden among other parcels and USPS mail processing equipment and K-9 “Dale” was allowed to search the entire area. Trooper McNamara concluded that K-9 “Dale” did alert positively to the SUBJECT PARCEL. Based on that alert, Trooper McNamara concluded that the odor of one or more of the drugs K-9 “Dale” is trained and certified to detect was present.

20. Based upon training and experience, I respectfully submit that the above information is indicative of drug trafficking activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

21. If the SUBJECT PARCEL is found to contain controlled substances, these controlled substances will be seized as part of an ongoing drug trafficking investigation. If the SUBJECT PARCEL is found to contain items of evidentiary value which are not contraband, to include currency, these items will be documented, photographed, repackaged, and returned to the US Mail for delivery.

22. In accordance with Title 18, United States Code, Section 3103a(b)(3), I request that the warrant delay notification of the execution of the warrant for 30 days from the execution of the warrant, or until October 20, 2022, because there is reasonable cause to believe that providing immediate notification may have an adverse result, as defined in Title 18, United

States Code, Section 2705. Providing immediate notice would seriously jeopardize the investigation by prematurely revealing its existence and giving suspects an opportunity to flee from prosecution, destroy or tamper with evidence, intimidate potential witnesses, notify confederates, and change patterns of behavior. The United States is still conducting its investigation and intends to continue its investigation with additional surveillance in California and the Southern District of Ohio.

23. In addition, pursuant to Title 18, United States Code, Section 3103a(b)(2), I request that the warrant prohibit the seizure of “any tangible property, or any wire or electronic communication (as defined in section 2510), or, except as expressly provided in chapter 121, any stored wire or electronic information., except where the court finds reasonable necessity for the seizure.” No such communications or information will be seized, and, as provided above, property will only be seized if it is believed to be or contain a controlled substance.

CONCLUSION

24. Based upon the foregoing facts and my training, experience, and expertise as a US Postal Inspector, I submit there is probable cause to search the SUBJECT PARCEL for controlled substances, drug proceeds, and other evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

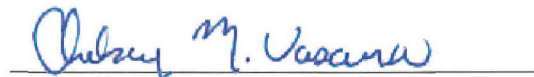
25. WHEREFORE, I respectfully request that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, and photograph the SUBJECT PARCEL and its contents.

26. The above information is true and correct to the best of my knowledge, information, and belief.

A handwritten signature in blue ink, appearing to read "Justin D. Koble", written over a horizontal line.

Justin D. Koble
US Postal Inspector

Sworn and subscribed to me
This 20th day of September 2022.

A handwritten signature in blue ink, appearing to read "Chelsea M. Vascara", written over a horizontal line.

CHELSEY M. VASCURA
United States Magistrate Judge

Attachment A

United States Postal Service Priority Express parcel EI 215 435 477 US addressed to "Ms. Goodall, 16809 Bellflower Blvd #312, Bellflower, CA 9070," which is currently located at the USPS office in Columbus, Ohio.



Attachment B

- 1.) Any controlled substances which constitute evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846
- 2.) United States currency and/or drug proceeds
- 3.) Contraband
- 4.) Any items that constitute indicia of ownership or possession of the parcel

If the SUBJECT PARCEL is found to contain controlled substances or containers that could hold controlled substances, these controlled substances and / or containers will be seized as part of an ongoing drug trafficking investigation. If the SUBJECT PARCEL is found to contain items of evidentiary value which are not contraband, to include currency, these items will be documented, photographed, repackaged, and returned to the US Mail for delivery.